

EXHIBIT 2



Freshfields Bruckhaus Deringer US LLP

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Confidential Treatment Requested

By Email

John Hogan
Technology and Financial Services Section
U.S. Department of Justice
450 5th St. NW
Washington, DC 20530

July 28, 2021

Re: Civil Investigative Demand No. 30471 - Handwritten Notes, Mobile Devices, and Chats

Dear John:

On behalf of Alphabet Inc. (“Company”), we write in response to the Antitrust Division’s (“the Division”) letter dated June 1, 2021 regarding handwritten notes, mobile devices, and chats in connection with Civil Investigative Demand No. 30471. The Company addresses each of the Division’s requests below:

1. Handwritten Notes

- a. **Division’s request:** “Please inform us when Alphabet will complete each of the following tasks: (1) complete production of all handwritten notes or other hard copy materials responsive to CID No. 30471 (“the CID”) for Ms. Stewart;” (2) complete production of all handwritten notes or other hard copy materials responsive to the CID for all other refresh or Group D custodians; and (3) provide a written explanation of all steps taken to preserve hard copy documents responsive to the CID for any refresh or Group D custodian (including but not limited to Ms. Stewart).”
- b. **Company’s response:**



- 1) The collection and processing of Ms. Stewart's handwritten notes and hard copy materials are underway. The Company will aim to produce any responsive, nonprivileged handwritten notes and hard copy materials from Ms. Stewart by August 9, 2021.
- 2) The collection and processing of handwritten notes or other hard copy materials for other refresh or Group D custodians are underway. The Company will aim to produce any responsive, nonprivileged handwritten notes and hard copy materials from other refresh or Group D custodians on a rolling basis, but no later than September 30, 2021.
- 3) The Company sent legal hold notices to Groups A-B custodians and other relevant employees on April 22, 2020, which instructed employees to preserve relevant handwritten notes or hard copy materials and respond if they possess any relevant handwritten notes or hard copy materials. Legal hold notices and subsequent reminders were also sent in May and June 2020. In August 2020, legal hold notices were sent to Group C custodians. Subsequent reminders were also sent in October 2020. An updated legal hold notice was sent to Groups A-C custodians in January 2021. In May and June 2021, legal hold notices and subsequent reminders were sent to all refresh and Group D custodians, which instructed employees to preserve any relevant handwritten notes or hard copy materials.

2. **Mobile Devices**

- a. **Division's request:** "While the Division remains mindful of the ongoing disruptions caused by the COVID-19 global pandemic and the changes to workplace policies, the Division renews its request that Alphabet collect mobile devices as soon as possible."
- b. **Company's response:** The Company remains committed to its continuing obligations to protect against the loss of potentially responsive materials. The Company has begun the collection of mobile devices that contain potentially relevant materials.

3. **Chats**

- a. **Division's request:** "As an initial matter, the Division requests that Alphabet provide, for each refresh and Group D custodian, the number of "on the record" chats collected from each such custodian."
- b. **Company's response:** The Company has collected a total of 57,739 chats from the Group D and refresh custodians.



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Custodian	Total
Nitish Korula	5103
Ali Miller	3400
David Goodman	2807
Sam Temes	2582
Debbie Weinstein	2477
Vivek Rao	2327
Drew Bradstock	2302
Tobias Maurer	2071
Robert Kyncl	2005
Chris LaSala	1783
Sissie Hsiao	1613
Ali Nasiri Amini	1594
Deepti Bhatnagar	1486
Rany Ng	1580
Noam Wolf	1450
Amin Charaniya	1216
Malte Ubl	1104
Roshan Khan	1040
Payam Shodjai	1026
Kristen Gil	972
Kirk Perry	942
Kate Alessi	818
Chetna Bindra	811
Sean Downey	760
Duke Dukellis	746
Donald Harrison	750
Alok Verma	688
Brad Bender	673
Vinay Rao	671



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Dan Taylor	564
Pooja Kapoor	557
Jonathan Bellack	507
Vlad Sinaniyev	495
Gabe Kronstadt	493
Woojin Kim	488
Sam Cox	487
Aparna Pappu	480
Eve Goldman	453
David Mitby	458
Mike Schulman	438
Chris Gklaros-Stavropoulos	384
Prabhakar Raghavan	376
Vidhya Srinivasan	370
Nirmal Jayaram	364
Paul Muret	366
Suresh Kumar	331
Sundar Pichai	329
Bethanie Baynes	322
Bonita Stewart	296
Jim Giles	296
Scott Sheffer	259
Haskell Garon	261
George Levitte	243
Jerry Dischler	197
Adam Juda	189
Neal Mohan	161
Max Loubser	183
Scott Spencer	139
Bryan Rowley	104



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Jayavel Shanmugasundaram	79
Eisar Lipkovitz	61
Joan Braddi	47
Erin Schaefer	37
Jason Miller	30
Patrick Jabal	23
Bashar Kachachi	20
Hal Varian	16
Dane Glaslow	11
Anthony Chavez	10
Amit Varia	6
David Besbris	5
Elissa Murphy	4
Jason Kreuger	3

* * *

The Company requests confidential treatment of these materials to the fullest extent allowed by law, including the Antitrust Civil Process Act, 15 U.S.C. § 1311 et seq., Exemption 4 of the Freedom of Information Act, as well as all other applicable statutes, regulations, and customary confidentiality policies. The Company specifically requests advance notice before disclosure of any of these materials to any person and return or destruction of materials when the Department's investigation is completed.

Please do not hesitate to contact me with any questions.

Sincerely yours,

/s/ Julie Elmer